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Attorneys for Certain Defendants

Attorneys for Certain Defendants

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

LEONARD C. ADAMS, et al.,

Plaintiffs,

vs.

SILAR ADVISORS, LP., et al.,

Defendants.

Case No.: 3:11-cv-00210-RCJ-VPC

STIPULATION AND [PROPOSED] ORDER
CONCERNING MOTION TO DISMISS

On October 11, 2011, the Court entered its Order granting the parties' stipulation to extend to October 31, 2011, the deadline for Silar Advisors, LP and certain other defendants (jointly and severally, "Silar") to file an amended motion to dismiss to accommodate on-going settlement discussions between Silar and Plaintiffs. The undersigned parties now stipulate that they have reached agreement on a settlement framework, and request that the Court continue Silar's filing deadline to at least November 14, 2011, to enable counsel for Silar, Plaintiffs, the Trustee, and Boris Piskun an opportunity to confer *in camera* with the Court about the status and various aspects of their potential settlement. This request is intended to facilitate the interests of justice and is not for purposes of delay.

Therefore, IT IS HEREBY STIPULATED that Silar's deadline to file an amended motion to dismiss is suspended until at least November 14, 2011. In addition, the undersigned parties request that the Court schedule an *in camera* conference with counsel for Silar, Plaintiffs, the Trustee, and

1 Boris Piskun at its earliest opportunity.

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3 Dated: October 31, 2011
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6 THE MAJORIE FIRM, LTD.,

7 By: /s/ Francis B. Majorie

8 Francis B. Majorie

9 Pro Hac Vice

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12 LAW OFFICE OF LISA RASMUSSEN,
ESQ.

13 COUNSEL FOR SILAR ADVISORS, LP,

14 SILAR SPECIAL OPPORTUNITIES

FUND, LP, SERVICING OVERSIGHT

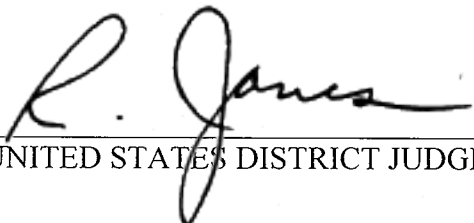
15 SOLUTIONS, LLC, SSOP, LLC, SMOF A, LLC

ROBERT LEEDS, MICHAEL D. REINER,

16 JAY GRACIN, CADE LIU, AND HIN KING TAI

COUNSEL FOR PLAINTIFFS

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18 IT IS SO ORDERED.
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20 
21 UNITED STATES DISTRICT JUDGE

22 Dated: October 31, 2011

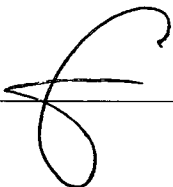
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 31st day of October, 2011, I served a copy of the foregoing Stipulation and Order via CM/ECF, as authorized by local rule as set forth on the attached Notice of ECF filing.

A handwritten signature in black ink, consisting of a stylized 'F' or '6' shape, is written over a horizontal line.